



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 30, 2017

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2017 ETC Annual Report of UBTA-UBET Communications, Inc.  
Study Area Code 502287**

Dear Ms. Dortch:

On behalf of UBTA-UBET Communications, Inc. ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

REDACTED FOR PUBLIC INSPECTION		FCC Form 481
FCC Form 481 - Carrier Annual Reporting		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2013

<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Karl Searle
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	ksearle@stratanetworks.com
Form Type		54.313 and 54.422

## FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<210> For the prior calendar year, were there any reportable voice service outages?							No					
<220>	<a>	<b1>	<b2>	<b3>	<b4>	<c1>	<c2>	<d>	<e>	<f>	<g>	<h>

[illegible]

<b>(300) Unfulfilled Service Request</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<300> Unfulfilled service request (voice)

0
---

<310> Detail on attempts (voice)

--

Name of Attached Document

<320> Unfulfilled service request (broadband)

0
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<330> Detail on attempts (broadband)

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Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
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<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0064
<450>	Complaints per 1000 customers for mobile broadband	

<b>(500) Compliance With Service Quality Standards and Consumer Protection Rules</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	502287
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
502287UT510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

<b>(600) Functionality in Emergency Situations Data Collection Form</b>	<b>REDACTED FOR PUBLIC INSPECTION</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	502287UT610.pdf

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]



FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<711>

-- See attached worksheet --

<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com
<810>	Reporting Carrier	UBTA-UBET COMMUNICATIONS
<811>	Holding Company	Not Applicable
<812>	Operating Company	UBTA-UBET COMMUNICATIONS

[illegible]

<b>(900) Tribal Lands Reporting</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039> Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<900> Does the filing entity offer tribal land services? (Y/N) Yes

<910> Tribal Land(s) on which ETC Serves

UTE Indian Tribe - Uintah and Ouray

<920> Tribal Government Engagement Obligation

502287UT920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 502287UT1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 502287UT1030.pdf

Name of Attached Document

<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	502287
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |  |                                     |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

**(2005) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	502287
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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)





Name of Attached Document Listing  
Required Information

Name of Attached Document Listing  
Required Information

**(2005) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing  
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)



(3005) Rate Of Return Carrier Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	502287
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<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
Yes - Attach Certification			
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		502287UT3010b.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	502287UT3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or		<input type="checkbox"/>
(3020)	(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3021)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3022)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		<input type="checkbox"/>
(3023)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3024)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3025)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3026)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

<b>(3005) Rate Of Return Carrier Additional Documentation (Continued)</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	502287
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

**Financial Data Summary**

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

<b>(4005) Rural Broadband Experiment Additional Documentation</b> <b>Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>July 2013</b>
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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
--	--	--

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
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4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	502287
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<039> Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: UBTA-UBET Communications, Inc	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/29/2017
Printed name of Authorized Officer: Karl Searle	
Title or position of Authorized Officer: Chief Financial Officer	
Telephone number of Authorized Officer: 4356225472 ext.	
Study Area Code of Reporting Carrier: 502287	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

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<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	502287
<015>	Study Area Name	UBTA-UBET Communications, Inc
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Karl Searle
<035>	Contact Telephone Number - Number of person identified in data line <030>	4356225472 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com

[illegible]



REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	502287
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<039>	Contact Email Address - Email Address of person identified in data line <030>	ksearle@stratanetworks.com
<810>	Reporting Carrier	UBTA-UBET COMMUNICATIONS
<811>	Holding Company	Not Applicable
<812>	Operating Company	UBTA-UBET COMMUNICATIONS

[illegible]

**UBTA-UBET Communications, Inc.’s demonstration of Compliance with Applicable Service Quality Standards and Consumer Protection Rules for voice and broadband services.**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

UBTA-UBET Communications, Inc. (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under the Utah Service Rules for Telecommunications Corporations. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of Utah Public Service Commission which disclose rates, terms and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

require billing procedures (R746-240-4) and procedures for responding to and resolving consumer disputes (R746-240-7); (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy. Pursuant to Telecommunications Service Rule R746-240-1.H, the Company provides a copy of "Customer's Statement of Rights and Responsibilities" as approved by the Utah Public Service Commission to all account holders.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

**UBTA-UBET Communications, Inc.'s demonstration of ability to function in emergency situations for voice and broadband services.**

UBTA-UBET Communications, Inc. hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).<sup>1</sup> The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company's central office can maintain 8 hours battery reserve rated for peak traffic load requirements, and a permanent auxiliary power unit is installed which can be delivered and connected within four hours. The Company has battery backup at all office locations and in its electronic equipment sites capable of running for a minimum of 8 hours. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

installed at all Central Office locations. They will continue to run as long as the Company has access to fuel. The Company tests the batteries at least once per year.

UBTA-UBET Communications, Inc.'s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

File Name: 502287UT920  
Study Area Code: 502287  
Study Area Name: UBTA-UBET Communications  
Program Year: 2016

UBTA-UBET Communications' service area includes providing landline services to the UTE Indian Tribe – Uintah & Ouray.

During the year 2016 UBTA-UBET Communications complied with the requirements of 47 CFR § 54.313(a)(9), Tribal Engagement Obligations, including, (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) Feasibility and sustainability planning; (iii) Marketing services in a culturally sensitive manner; (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) Compliance with Tribal business and licensing requirements.

I. §54.313(a)(9)(i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions.

While communication services have been provided to the Tribal community since the early beginning of UBTA-UBET Communications in 1954, and overtime to all Tribal Anchor institutions, the Tribe decided that as a sovereign nation, it needed to have its own fiber between key locations and institutions. Working together, the Tribal government and UBTA-UBET Communications determined the best solution was for UBTA-UBET Communications to place the fiber according to the engineered plans. The fiber was successfully put in place as desired and the network is up and operational.

UBTA-UBET communications works with the Tribe to understand their needs and plans to assure services are available as needed. Services of UBTA-UBET are available to Tribe members and Tribal locations and are provided on a non-discriminatory basis.

II. §54.313(a)(9)(ii) Feasibility and sustainability planning.

UBTA-UBET Communications and the UTE Indian Tribe have been working in cooperation since 1954, together we have proven the feasibility and sustainability of communication services to the Tribal area. Through the needs assessment and deployment planning process the need to extend Tribal owned fiber to Tribal Anchor Institutions was determined. The feasibility of the extensions was discussed and evaluated and the conclusion was made that the fiber extensions would be sustainable. This collaboration resulted in a fiber architecture connecting the anchor institutions of the Tribe enhancing and sustaining its efforts related to sovereignty. In 2013, fiber was extended and connected to essential Tribal locations. These included the Tribal Government Offices, Federal Offices, Law Enforcement, Schools, Community Centers, Supermarket, coffee shop and the Senior Center.

III. §54.313(a)(9)(iii) Marketing services in a culturally sensitive manner.

Working with the Tribal government and leadership, specific opportunities via current tribal information and education programs have been identified to promote awareness of lifeline services and employment opportunities. This has resulted in improving the dissemination of this important information.

IV. §54.313(a)(9)(iv) Rights of way process, land use permitting, facilities siting, environmental and

cultural preservation review processes.

The Tribal government keeps UBTA-UBET Communications informed of the processes required for Rights of Way, land use permitting and facilities siting. UBTA-UBET Communications works with the appropriate Tribal offices and designee to assure full compliance with the Tribal processes.

UBTA-UBET Communications works in unison with the Tribe to assure environmental and cultural preservation needs are not overlooked or harmed.

V. §54.313(a)(9)(v) Compliance with Tribal business and licensing requirements.

During 2016 UBTA-UBET Communications complied with all business licensing requirements, UTERO and all access permitting of the Tribe through-out the year 2016.

Response to Line 1010  
UBTA-UBET Communications, Inc.  
Study Area 502287

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) UBTA-UBET Communications, Inc. ("UBTA-UBET") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$49.51 as specified in Public Notice DA 17-167 issued on February 14, 2017. The rates provided in response to Line 700 of this Form 481 demonstrates that UBTA-UBET's current total local end-user rate<sup>1</sup> is not above the standard deviation as specified in the USF/ICC Transformation Order.<sup>2</sup>

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<sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."



Response to Line 1030  
UBTA-UBET Communications, Inc.  
Study Area 502287

Broadband Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (1) UBTA-UBET Communications, Inc. ("UBTA-UBET") charges a residential rate of \$39.99 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$77.98, which is the 2016 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau in Public Notice DA 17-167 issued on February 14, 2017.

**UBTA-UBET Communications, Inc.**  
**P.S.C. UTAH NO. 1**

**1st Revised Sheet No. 28**  
**Cancels Original Sheet No. 28**

NETWORK ACCESS LINE SERVICE

RATES

Monthly Rate

Per Access Line	<u>Residence</u>	<u>Business</u>
One-Party Service	\$ 16.50 (1FR)	\$ 26.00 (1FB)
PBX Trunk		1 1/2 x Business Access Line Rate (PBXFL)
PBX Outward Only		\$ 26.00 (PBXOW)
Key System		1 1/2 x Business Access Line Rate (PBXFL)
Family Line	\$ 16.50 (1FL)	
Extended Area Service		
Vernal Area (789 & 781)	\$ 1.80 (EASV)	\$ 1.80 (EASV)
Roosevelt Area (722 & 725)	2.25 (EASR)	2.25 (EASR)
Duchesne Area (738)	3.25 (EASD)	3.25 (EASD)
All other areas (454, 353, 247, 545, 646, 848, 548)	5.75 (EASU)	5.75 (EASU)

CONDITIONS

The above rates apply to the provision of network access lines which, when connected to a suitable instrument provides access to the telecommunications network.

Instruments must be provided by the subscriber, subject to the conditions described in the Connection With Subscriber-Owned Equipment portion of this tariff.

Additional instruments may be attached to network access lines. The Company reserves the right to limit the number of instruments connected to an access line if they cause interference with the normal operation of the line.

Touch-Tone service is provided only where the facilities are available.

PBX Outward Only allows only outgoing calls from the customer's PBX or Key System. It provides access to 911, dial tone, operator services, and long distance services, but does not allow incoming calls.

2. RATES

- A. Baseline Lifeline is a reduction or credit in the local service charges normally paid by qualifying low-income consumers. The reduction to the normal residential one-party rates are as follows:

<u>Residential Access Lines</u>	<u>Monthly Credit or Discount</u>
Federal Baseline Lifeline Reduction	\$ 9.25
Federally Funded Reduction in Local Rate	\$ 2.75
State Matching Local Rate Reduction	\$ 3.50

These reductions or credits are from the normal residential one-party service subscribed to by the consumer. The Federal Baseline Lifeline reduction shall be used to waive the consumer's Federal End-User Common Line Charge or Subscriber Line Charge.

In addition to the above Federal Service Discount, the State may provide an additional discount for eligible consumers, pursuant to Public Service Commission of Utah Rules R746-341. The State Discount is only provided if it is funded through the State's Universal Service Fund.

In no case will the discount exceed the rate charged for the service subscribed to by each individual.

- B. The following services are included:

1. Single party, voice grade access to the Public Switched Network
2. Access to emergency services
3. Access to operator services
4. Access to interexchange services, unless toll blocking is chosen
5. Access to directory assistance
6. Toll Blocking
7. Extended Area Service

- C. Tribal Lifeline

1. Tribal Lifeline will consist of up to an additional \$25 per month, per primary residential connection for qualifying low-income individuals living on qualifying tribal lands.

**UBTA-UBET Communications, Inc.**  
**P.S.C. UTAH NO. 1**

**1st Revised Sheet No. 76**  
**Cancels Original Sheet No. 76**

LIFELINE (Cont'd)

2. RATES (Cont'd)

C. Tribal Lifeline (Cont'd)

2. Tribal Lifeline benefits apply to the primary local residential access line. This additional federal Lifeline support will be provided to reduce the qualifying customer's basic monthly service rate to \$1.00 per month.

3. LIFE LINE ELIGIBILITY REQUIREMENTS

- A. An applicant must meet eligibility requirements established in the Public Service Commission of Utah Rules R746-341.
- B. Customer must complete the approved application for the Utah Telephone Assistance Program (UTAP) and submit the application to UTAP program for eligibility certification.
- C. The customer must be recertified annually by the appropriate state agency
- D. The premises at which the residential service is requested is the applicant's principal place of residence.
- E. There is only one telephone line serving the residential premises eligible for the credit. The residential premises shall consist of that portion of an individual house or building or one flat or apartment occupied by a single family or individuals functioning as one domestic unit.

4. TRIBAL LIFELINE ELIGIBILITY REQUIREMENTS

- A. Residents of tribal lands who qualify for Lifeline based on the requirements listed below are eligible for the Tribal Lifeline benefit if they participate in one or more of the following programs or meet the traditional lifeline eligibility requirements listed above.
  1. Bureau of Indian Affairs (BIA) general assistance program,

LIFELINE (Cont'd)

4. TRIBAL LIFELINE ELIGIBILITY REQUIREMENTS (Cont'd)

A. (Cont'd)

2. Tribally administered Temporary Assistance for Needy Families block grant program,
3. Head Start programs (only those meeting its income-qualifying standard),
4. National School Lunch Program's free lunch program.

- B. The customer must sign, under penalty of perjury a document certifying that such customer receives benefits from at least one of the programs above, and lives within a qualifying area. In addition, the customer must also agree to notify the Company if that customer ceases to participate in the qualifying program or programs.

5. FUNDING

The total cost of providing the State Lifeline program shall be funded from the Utah Universal Service Fund.

6. REGULATIONS

- A. The Telephone Assistance Program credit will begin with the next billing cycle of the company following the date the Company receives a valid application from the customer or when new service is established for a qualifying customer.
- B. The regular service connection charge, move and change charge, and regulations applicable to the service offerings specified in the tariff will apply. The service connection charge and move and change charge to change to or from this program due to eligibility status will be waived.

LIFELINE (Cont'd)

6. REGULATIONS (Cont'd)

C. The Lifeline credit will be subject to the following restrictions:

1. Applicant must be head of household or person whose name the property or rental agreement resides.
2. Lifeline credit will only be provided to the applicant's principle residence.
3. The credit will only be applicable for one single residential access line.

D. Lifeline will not be furnished on a Foreign Exchange (FEX) basis.

E. Lifeline service shall not be disconnected for non-payment of toll charges.

F. If the consumer chooses "toll blocking", the company will not charge a service deposit. Deposits will not be required if customers choose the toll blocking option. No toll blocking charges will be assessed to Lifeline subscribers.

7. The Company will offer Lifeline assistance only during such periods as reimbursement of the discount is available to the Company from Federal and/or State revenue sources.

TRIBAL LINK UP

1. GENERAL

Applicable to customers of the Company who apply for basic residential service, and are an eligible resident of Tribal Lands.

2. DESCRIPTION

A. Tribal Link Up consists of a discount, for new service connection charges to connect the customer to the local telephone network. Discount may not be taken on service order or connection charges that pertain to deregulated services such as inside wiring or terminating equipment.

B. Tribal Link Up

Residents on qualifying Tribal lands (reservations) who qualify for Tribal Lifeline are eligible for a Link Up benefit of up to \$100. The benefit will apply towards 100% of the connection charges between \$60.00 and \$130.00, which are assessed to begin service at the primary residence of eligible residence. Eligible charges include any charges customarily assessed to connect the subscriber to the network, including line extension charges, zone charges, and special construction charges.

3. ELIGIBILITY REQUIREMENTS

A. An applicant must meet all of the following criteria in order to qualify for Link Up.

1. The premises at which the residential service is requested is the applicant's principal place of residence.
2. There is only one telephone line serving the residential premises eligible for this discount. The residential premises shall consist of that portion of an individual house or building or one flat or apartment occupied by a single family or individuals functioning as one domestic unit.
3. An applicant who is an eligible resident of Tribal lands must meet the Tribal Lifeline requirements noted in this tariff in the preceding Lifeline section.

**UBTA-UBET Communications, Inc.**  
**P.S.C. UTAH NO. 1**

**1<sup>st</sup> Revised Sheet No. 80**  
**Cancels Original Sheet No. 80**

LINK UP (Cont'd)

3. ELIGIBILITY REQUIREMENTS (Cont'd)
  - B. Link Up will not be furnished on a Foreign Exchange (FEX) basis.
  - C. Lifeline qualifying customers are entitled to a reduction of the connection charges once every twelve (12) months.
4. Link Up Assistance will not apply to:
  - A. Any business service.
  - B. Any optional residential services such as a custom calling feature.
  - C. Any private line services whether for residential use or otherwise.
  - D. Deposits used for the establishment of credit.
  - E. Any monthly recurring charges.
5. The Company will offer Link Up Assistance only during such periods as reimbursement of the discount is available to the Company from Federal and/or State revenue sources.



**UBTA-UBET Communications, Inc. (SAC 502287)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

UBTA-UBET Communications, Inc. hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, UBTA-UBET Communications, Inc. offers broadband service at the highest available speed.

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**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**